

PACIFIC JUSTICE INSTITUTE  
KEVIN T. SNIDER, SBN 170988  
MATTHEW B. MCREYNOLDS, SBN 234797  
P.O. Box 276600  
Sacramento, CA 95827  
Telephone: (916) 857-6900  
Facsimile: (916) 857-6902  
[ksnider@pji.org](mailto:ksnider@pji.org)  
[mmcreynolds@jpi.org](mailto:mmcreynolds@jpi.org)

Attorneys for Plaintiff,  
JULIE AMORUSO

JACKSON LEWIS P.C.  
MICHAEL J. CHRISTIAN (SBN 173727)  
SHANE R. LARSEN (SBN 283966)  
400 Capitol Mall, Suite 1600  
Sacramento, California 95814  
Telephone: (916) 341-0404  
Facsimile: (916) 341-0141  
[Michael.Christian@jacksonlewis.com](mailto:Michael.Christian@jacksonlewis.com)  
[Shane.Larsen@jacksonlewis.com](mailto:Shane.Larsen@jacksonlewis.com)

Attorneys for Defendant,  
THE PERMANENTE MEDICAL GROUP, INC.

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA – SACRAMENTO DIVISION

JULIE AMORUSO,

Plaintiff,

v.

THE PERMANENTE MEDICAL GROUP, a  
California corporation; and KAISER  
FOUNDATION HOSPITALS, a California  
corporation, collectively dba KAISER  
PERMANENTE SOUTH SACRAMENTO  
MEDICAL CENTER, KAISER PERMANENTE  
ROSEVILLE MEDICAL CENTER and  
KAISER PERMANENTE STOCKTON  
FACILITY,

Defendants.

Case No. 2:20-CV-01335-KJM-DB

**JOINT STIPULATION AND REQUEST  
FOR CONTINUANCE OF PRETRIAL  
DEADLINES AND [PROPOSED]  
ORDER**

Complaint Filed: July 6, 2020  
Trial Date: TBD

Counsel for Plaintiff JULIE AMORUSO (“Plaintiff”) and Defendant THE  
PERMANENTE MEDICAL GROUP, INC. (“Defendant”), (collectively referred to as the

“Parties”), hereby enter into the following Stipulation and request the Court to extend certain pretrial deadlines, pursuant to applicable Local Rules:

1. This is an action for alleged violation of Title VII of the Civil Rights Act of 1964: Failure or Refusal to Hire on Basis of Religion; Failure to Provide Religious Accommodation; and Disparate Impact on the Basis of Religion; and in violation of California Fair Employment Housing Act: Refusal to Hire on the Basis of Religious Creed; Failure to Provide Religious Accommodation; and Disparate Impact on behalf of Religion. The Parties have engaged in written discovery. The depositions of Plaintiff and relevant managers have been scheduled, and the depositions of remaining fact witness are in the process of being scheduled. No trial date has been set at this time.

2. Good cause exists to continue the pretrial deadlines because the Parties have been unable to complete depositions, and may wish to engage in further post-deposition discovery and engage in informal resolution discussions. Defendant and its employees, as healthcare providers, have been particularly impacted by the COVID-19 pandemic, which has limited the availability of employees for deposition and completion of discovery. Because no trial date has been set in this matter, and the Parties are in agreement, no prejudice will be suffered by the Parties and the Court’s docket will not be adversely impacted by granting this request.

3. The Parties hereby stipulate to the following new dates and request the Court to modify the scheduling order accordingly:

<b><u>CATEGORY</u></b>	<b><u>PRIOR DEADLINE</u></b>	<b><u>PROPOSED DEADLINE</u></b>
Fact Discovery Cut-Off	October 15, 2021	January 28, 2022
Expert Disclosures	October 7, 2021	January 21, 2022
Rebuttal Expert Witnesses Exchange	November 1, 2021	February 15, 2022
Expert Discovery Cut-Off	December 15, 2021	April 1, 2022
Dispositive Motions	January 21, 2022	April 4, 2022

1 It is so AGREED.

2 Date: September 29, 2021

PACIFIC JUSTICE INSTITUTE

3  
4 By: /s/ Matthew B. McReynolds [Auth. 9.29.21]

KEVIN T. SNIDER

MATTHEW B. MCREYNOLDS

5 Attorneys for Plaintiff

6 JULIE AMORUSO

7  
8 Date: September 29, 2021

JACKSON LEWIS P.C.

9  
10 By: /s/ Michael J. Christian

MICHAEL J. CHRISTIAN

11 SHANE R. LARSEN

12 Attorneys for Defendant

13 THE PERMANENTE MEDICAL GROUP,  
14 INC.

**ORDER**

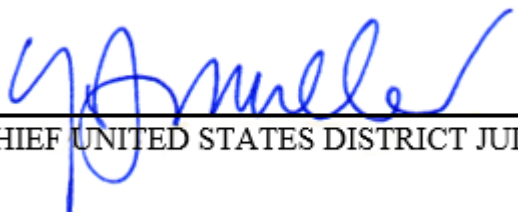
The Court, having considered the foregoing stipulation of the parties, and good cause appearing therefor, makes the following order:

IT IS ORDERED THAT THE PRETRIAL DEADLINES ARE CONTINUED AS FOLLOW:

<b><u>CATEGORY</u></b>	<b><u>PRIOR DEADLINE</u></b>	<b><u>NEW DEADLINE</u></b>
Fact Discovery Cut-Off	October 15, 2021	January 28, 2022
Expert Disclosures	October 7, 2021	January 21, 2022
Rebuttal Expert Witnesses Exchange	November 1, 2021	February 15, 2022
Expert Discovery Cut-Off	December 15, 2021	April 1, 2022
Dispositive Motions Hearing Date	January 21, 2022	April 15, 2022

**IT IS SO ORDERED.**

DATED: October 5, 2021.

  
CHIEF UNITED STATES DISTRICT JUDGE